

IN THE UNITED STATES COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

TEXAS TRIBUNE, MANO AMIGA, and  
CALDWELL/HAYS EXAMINER,  
Plaintiffs,

V.

CALDWELL COUNTY, TEXAS, TREY  
HICKS, in his official capacity as Caldwell  
County Court at Law Judge and Caldwell  
County Magistrate,

MATT KIELY, SHANNA CONLEY,  
ANITA DELEON, and YVETTE MIRELES,  
in their official capacities as Caldwell County  
Justices of the Peace and Caldwell County  
Magistrates, and

MIKE LANE, in his official capacity as the Sheriff of Caldwell County,  
Defendants.

[illegible]

Civil Action No. 1:23-cv-910

## JOINT MOTION TO EXTEND STAY

In accordance with the Docket Text Order dated June 2, 2025, Plaintiffs Texas Tribune, Mano Amiga and Caldwell/Hays Examiner and Defendants Caldwell County, Texas, the Honorable Trey Hicks, in his official capacity as Caldwell County Court at Law Judge and Caldwell County Magistrate, the Honorable Matty Kiely, the Honorable Shanna Conley, the Honorable Anita DeLeon, and the Honorable Yvette Mireles, in their official capacities as Caldwell County Justices of the Peace and Caldwell County Magistrates, and the Honorable Mike Lane, in his official capacity as the Sheriff of Caldwell County, (hereinafter “Parties”) file this joint motion to extend the stay.

The Parties continue to work in earnest to finalize details of a possible resolution of this matter. After consultation with the Caldwell County Commissioners, counsel for Defendants has

presented Plaintiffs' counsel with a counterproposal. Counsel for both Parties have met to narrow the unresolved ground. The Parties now respectfully request that the Court permit the Parties to continue necessary discussions between undersigned counsel and their respective clients.

WHEREFORE, the Parties respectfully request that the Court permit them to continue settlement negotiations and file either dismissal papers or an agreed motion to extend the stay on or before August 29, 2025.

DATED: July 15, 2025

/s/ Camilla Hsu

Camilla Hsu  
State Bar No. 24130207  
Deason Criminal Justice Reform Center  
SMU Dedman School of Law  
P.O Box 750116 | Dallas, TX 75275  
(214) 768-6974  
camillah@smu.edu  
*Counsel for Plaintiffs Mano Amiga and Caldwell/Hays Examiner*

/s/ Scott Wilkens

Scott Wilkens, Pro Hac Vice  
Knight First Amendment Institute at  
Columbia University  
475 Riverside Drive, Suite 302  
New York, NY 10115  
(646) 745-8500  
scott.wilkens@knightcolumbia.org  
*Counsel for Plaintiffs*

/s/ J. Eric Magee

J. Eric Magee  
SBN: 24007585  
e.magee@allison-bass.com  
Susana Naranjo-Padron  
SBN: 24105688  
s.naranjo-padron@allison-bass.com  
ALLISON, BASS & MAGEE, L.L.P.  
1301 Nueces Street, Suite 201  
Austin, Texas 78701  
(512) 482-0701 telephone  
*Counsel for Defendants*